

ZEICHNER ELLMAN & KRAUSE LLP
103 Eisenhower Parkway
Roseland, New Jersey 07068
(973) 618-9100
WILLIAM T. MARSHALL, JR.
PHILIP S. ROSEN
KERRY A. DUFFY
Attorneys for Defendant Bank of America, N.A.

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ARKADIUZ MINKLEIN,

Plaintiff,

v.

BANK OF AMERICA, N.A., SUBURBAN
TITLE EXAMINERS, INC.,

Defendants.

Civil Action No. 2:10-cv-00810
(WJM MF)

TO: Clerk
United States District Court
District of New Jersey
Clarkson S. Fisher Federal Building
& U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

**APPLICATION FOR EXTENSION OF TIME
TO ANSWER, MOVE, OR OTHERWISE
REPLY TO AMENDED COMPLAINT
[Local Civil Rule 6.1(b)]**

Application is hereby made for a Clerk's Order extending the time within which Defendant Bank of America, N.A. ("Bank of America"), appearing by its undersigned counsel, may answer, move, or otherwise respond to the Amended

Complaint filed by Shmuel Klein, Esq., Attorney for Plaintiff, Ardashiz Minklein from July 20, 2010 to August 4, 2010.

1. No previous extension has been obtained by Bank of America as to the Amended Complaint;
2. Service of process was made on Bank of America on May 21, 2010;
3. Based on the date of service, Bank of America's time to answer, move or otherwise respond to the Amended Complaint expires on July 20, 2010.
4. Bank of America respectfully requests, pursuant to L. Civ. R. 6.1(b), that it be granted a 15 day extension of time, to August 4, 2010, within which to answer, move or otherwise respond to the Amended Complaint.

ZEICHNER ELLMAN & KRAUSE LLP
Attorneys for Defendant Bank of America, N.A.

BY:


WILLIAM T. MARSHALL, JR. (WM0626)
PHILIP S. ROSEN (PSR0116)
KERRY A. DUFFY (KD6480)

DECLARATION OF SERVICE

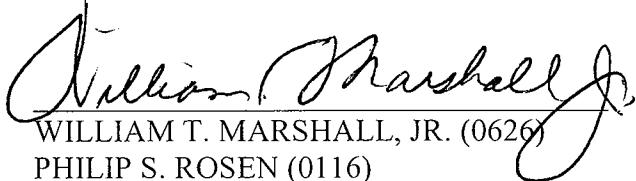
I hereby declare that Defendant Bank of America, N.A. served a copy of the application for extension of time to answer, move, or otherwise reply to Amended Complaint upon the following:

John J. Sullivan, Jr., Esq.
Vastola, Fackelman & Sullivan
495 Union Avenue
P.O. Box 7
Middlesex, New Jersey 08846
(732) 560-0888

DATED: July 20, 2010

ZEICHNER ELLMAN & KRAUSE LLP
Attorneys for Defendant Bank of America,
N.A.

BY:


WILLIAM T. MARSHALL, JR. (0626)
PHILIP S. ROSEN (0116)
KERRY A. DUFFY (KD6480)

ORDER

The above application is hereby ORDERED GRANTED, and Defendant Bank of America's time to answer, move or otherwise respond to the Amended Complaint is hereby extended to and including August 4, 2010.

ORDER DATED: _____

WILLIAM T. WALSH, Clerk

BY: _____
Deputy Clerk